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MEMO ENDORSED

January 4, 2024

VIA ECF

Hon. Edgardo Ramos
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

The deadline to respond to the complaint is extended to March 8, 2024 for all defendants. SO ORDERED.

Edgardo Ramos, U.S.D.J.

Dated: January 4, 2024

New York, New York

Re: Deshanae Brown v. NYC Human Resources Administration, Moustapha Boukari, Frank Agbi, Asra Horton, Laurie Moore, and Candi Rufus, 23 Civ. 9113 (ER)

Dear Judge Ramos:

I am an Assistant Corporation Counsel in the Office of the Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, attorney for Defendant New York City Human Resources Administration ("HRA"), in the above-referenced action. This action also names five individual employees of HRA.

I write in accordance with Rule 1E. of Your Honor's Individual Practice Rules, to respectfully request that HRA's time to respond to the complaint be extended from January 8 to March 8, 2024. This Office similarly requests that the Court *sua sponte* extend the individually-named defendants' time to respond to March 8, 2024.¹ This is the first request for this extension.

¹ It appears that with the exception of Defendants Rufus and Boukari, the remaining individually-named defendants (Agbi, Horton, and Moore), must respond to the Complaint by January 11, 2024. The Docket indicates that Boukari and Rufus were required to respond by December 27, 2023, but this is incorrect, as these two individuals returned the acknowledgement forms on the statement of service by mail on December 26, 2023, which would have then made their answers due on February 24, 2024, *not* December 27, 2023.

Plaintiff is *pro se* and does not consent to any extension of time for any Defendant. When I asked for plaintiff's consent, he responded by email that: "I have been thru [sic] far too much harsh treatment and no consideration from HRA when I request anything. I do not agree to extend any time or accomodations [sic] for any Defendant. I was not even provided Counsel to assist me with this case in any fashion. Therefore, a large Entity such as HRA should not receive any accommodations [sic]."

We respectfully request this extension to allow our Division time to assign this case to an attorney, and to permit sufficient time to investigate the numerous factual allegations in the complaint and craft an appropriate response. Additional time is also needed to make representation determinations for the five individually-named defendants in accordance with General Municipal Law 50-k. The complaint and exhibits annexed thereto total 109 combined pages, and centers around Plaintiff's contention that since his hiring in 2016, HRA "has been orchestrating oppressive or color discriminatory situations against [him]."

I thank the Court for consideration of this request.

Respectfully,

Iván A. Méndez, Jr.

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Assistant Corporation Counsel